

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

KIRBY INLAND MARINE, LP

§

v.

§

C.A. NO. 3:19-cv-00207

§

FPG SHIPHOLDING PANAMA 47 S.A.,
K LINE ENERGY SHIP MANAGEMENT,
and the VLGC GENESIS RIVER, *in rem*

§
§

IN THE MATTER OF KIRBY INLAND
MARINE, LP, in a cause for exoneration
from or limitation of liability

§
§

Rule 9(h) - Admiralty

**THE GENESIS RIVER INTERESTS'
DESIGNATION OF EXPERT WITNESSES FOR BELLWETHER TRIAL**

COME NOW, FPG Shipholding Panama 47 S.A., Ship No. 138 Co. Ltd., Ship No. 139 Co. Ltd., Genesis River Shipping, S.A., and "K" Line Energy Ship Management Co., Ltd. (the "Genesis River Interests"), by their attorneys, ROYSTON RAYZOR VICKERY & WILLIAMS, LLP, and pursuant to Rule 26 of the Federal Rules of Civil Procedure, file this their Designation of Expert Witnesses for Bellwether Trial, and would respectfully show as follows:

I.

The Genesis River Interests may call the following witnesses to present expert testimony, either live at trial or by deposition:

Retained Experts

Ygnacio D. Garza, CPA, CVA
Jean-Paul Tujague, CPA, CFF, CFE
CARR, RIGGS & INGRAM, LLC
3125 Central Boulevard
Brownsville, Texas 78520

The Curriculum Vitae and reports of these witnesses will be contemporaneously produced to all counsel.

Cord Harris, Ph.D., P.E.
Lis Nelis, Ph.D.
Shaun Gannon
RAMBOLL US CONSULTING
10333 Richmond Avenue, Suite 910
Houston, Texas 77042

The Curriculum Vitae and report of these witnesses will be contemporaneously produced to all counsel.

II.

The Genesis River Interests designate all other parties' experts, as well as fact witnesses identified by each party that have or will express expert opinions in this case, to the extent that such opinions are not adverse to the Genesis River Interests. The Genesis River Interests reserve the right to elicit expert testimony from their own as well as other parties' past and present employees, the witnesses identified in the other parties' expert witness designations, and each party's discovery disclosures.

III.

The Genesis River Interests reserve their right to elicit expert testimony on cross-examination from any person or entity from whom any other party is allowed to present expert testimony.

IV.

The Genesis River Interests reserve the right to withdraw the designation of any expert witness and to aver positively that a previously designated expert will not be called as an expert witness at trial and to re-designate same as a consulting expert who cannot be called by opposing counsel.

V.

The Genesis River Interests reserve the right to file amended reports and elicit opinion testimony from individuals and expert witnesses as needed for rebuttal or impeachment testimony and to supplement its designation as necessary for such purposes as this case is fully developed.

VI.

The Genesis River Interests reserve the right to designate other expert witnesses in accordance with the parties' agreements or the Court's Order.

Respectfully submitted,

By: /s/ Dimitri P. Georgantas

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Attorneys for the Genesis River Interests

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of July, 2021, I served a true and correct copy of the foregoing pursuant to Rule 5 of the Federal Rules of Civil Procedure, via the CM/ECF system and/or electronic mail and/or by depositing in the United States Mail, postage prepaid and properly addressed to all known counsel of record.

/s/ Dimitri P. Georgantas
Dimitri P. Georgantas